UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION AT COLUMBUS

JEROME B. WILLIAMS : Civi

Civil Action No. C-2-01-681

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Plaintiff, : Judge Marbley

v. : Magistrate Judge Abel

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GENERAL ELECTRIC COMPANY, : **DEFENDANT THE GENERAL**

et al. : <u>ELECTRIC COMPANY'S</u>

: <u>DESIGNATION OF DEPOSITION</u>

Defendants. : **PORTIONS**

In accordance with the Court's August 27, 2003 Order and Federal Rule of Civil Procedure 26(a)(3)(B), Defendant General Electric Company hereby gives notice of its designation of deposition portions.

Counsel for Plaintiff have indicated that they will be reading into the record the entire deposition transcripts of Thomas Bilia; Michael Coleman; John Keegan; Louis Sweatland; and Norris Woodruff. As Plaintiff's counsel will be reading into the record the entire deposition transcripts of all of these witnesses, there are no portions of deposition transcripts left for the Defendant to designate.

In the event that Plaintiff determines that he will not be reading into the record the entire deposition transcripts of any or all of the above-referenced individuals, Defendant reserves the right to read into the record any portion that is necessary for it to present its case-in-chief. Furthermore, in accordance with the Court's August 27, 2003, Order, Defendant, for the purposes of impeachment of witnesses, may use deposition portions that are not specifically identified by Plaintiff.

Respectfully Submitted,

/s/ Charles M. Roesch

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Attorneys for Defendant, General Electric Company

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing Defendant's Designation of Deposition Portions was served by electronic filing upon Russell Kelm, Attorney for Plaintiff, Law offices of Russell A. Kelm, 37 W. Broad Street, Suite 860, Columbus, Ohio 43215, this 10th day of October, 2003.

/s/ Trina M. Walton
Trina M. Walton, Esq.

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